

Exhibit A

DISTRICT COURT CIVIL COVER SHEET

County, Nevada
Case No. A-15-714996-C Dept XXIII
(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): KRISHAN LAL, KULDIP
KAUR, KANCHAN PAUL, and RANJANA PAUL

Defendant(s) (name/address/phone): MARJNA LONG,
CORPORATION OF THE PRESIDENT OF THE CHURCH
OF JESUS CHRIST OF LATTER-DAYS SAINTS, ET AL.

Attorney (name/address/phone):

Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property	Torts	
Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input checked="" type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate	Construction Defect & Contract	Judicial Review/Appeal
Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,00 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review Appeal
Civil Writ		Other Civil Filing
Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court Civil Cover Sheet

Date

Signature of initiating party or representative

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CLERK OF THE COURT

1 **COMP**
2 **LEON R. SYMANSKI, ESQ.**
3 Bar No. 8686
4 **CRAIG P. KENNY & ASSOCIATES**
5 501 S. Eighth Street
6 Las Vegas, Nevada 89101
7 (702) 380-2800
8 Attorneys for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

8 **KRISHAN LAL, KULDIP KAUR,**
9 **KANCHAN PAUL, and RANJANA PAUL,**

Case No. A-15-714996-C

10 Plaintiffs,

Dept No. XXIII

11 v.

12 **MARINA LONG, CORPORATION OF THE**
13 **PRESIDENT OF THE CHURCH OF JESUS**
14 **CHRIST OF LATTER-DAY SAINTS,**
15 **CORPORATION OF THE PRESIDING**
16 **BISHOP OF THE CHURCH OF JESUS**
17 **CHRIST OF LATTER DAY SAINTS, DOES**
18 **I through X, inclusive; and ROE**
19 **CORPORATIONS I through X, inclusive**

Exempt from Arbitration
- Amount in Excess of \$50,000.00

20 Defendants.

COMPLAINT

21 Plaintiffs, by and through their attorneys CRAIG P. KENNY & ASSOCIATES, hereby alleges
22 as follows:

23 1. That at all times mentioned herein and material hereto, Plaintiffs KRISHAN LAL, KULDIP
24 KAUR, KANCHAN PAUL, and RANJANA PAUL are and were residents of Las Vegas, Clark County,
25 Nevada.

26 2. That Defendant MARINA LONG was and is, at all times mentioned herein, a resident of Las
27 Vegas, Clark County, Nevada.

28 3. That Defendant CORPORATION OF THE PRESIDENT OF THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS, hereinafter (hereinafter "PRESIDENT"), was and is an entity

1 duly authorized to conduct business in the State of Nevada.

2 4. That Defendant, hereinafter CORPORATION OF THE PRESIDING BISHOP OF THE
3 CHURCH OF JESUS CHRIST OF LATTER DAY SAINTS (hereinafter "BISHOP"), was and is an
4 entity duly authorized to conduct business in the State of Nevada.

5 5. That all times mentioned in this Complaint, on June 26, 2014, Defendant LONG was a
6 permissive user of a 2013 Chevy Malibu owned by Defendants PRESIDENT and BISHOP on Alexander
7 Road at its intersection with Durango Blvd in Las Vegas, Nevada.

8 6. That at all times mentioned herein, Defendant LONG was an employee, agent, and/or
9 missionary of Defendants PRESIDENT, BISHOP, DOES I through X, and/or ROE CORPORATIONS
10 I through X, and that all acts or omissions mentioned herein which were performed by Defendant
11 LONG, were performed within the course and scope of her employment/agency/missionary work with
12 said Defendants.

13 7. The true names and capacities, whether individual, corporate, associate, or otherwise, of
14 the Defendants named herein as DOES I through X and ROE CORPORATIONS I through X, inclusive,
15 are unknown to Plaintiffs at this time and Plaintiffs, therefore, sue said Defendants by such fictitious
16 names. Plaintiffs are informed and believes and, therefore, alleges that each of the Defendants
17 designated herein as DOE are responsible in some manner for the events and happenings referred to and
18 caused damages proximately to Plaintiffs as hereinafter alleged, and Plaintiffs will ask leave of this
19 Court to amend her Complaint to insert the true names and capacities of said DOES when the same
20 become ascertained, and join said Defendants in this action.

21 8. On Thursday June 26, 2014, at 7:37 p.m. in Las Vegas, Clark County, Nevada, Plaintiff
22 KRISHAN LAL was operating a vehicle with Plaintiffs KULDIP KAUR, KANCHAN PAUL, and
23 RANJANA PAUL as his passengers. Plaintiffs were driving southbound on Durango and they had a
24 green light as they entered the intersection with Alexander Road. Defendant LONG, who was in the
25 course and scope of her employment, agency, missionary work with Defendants PRESIDENT and
26 BISHOP, was driving eastbound on Alexander the Chevy Malibu owned by Defendants PRESIDENT
27 and BISHOP. Defendant LONG was driving at 52 mph, more than 7 miles above the speed limit, on
28 Alexander and as she approached the intersection with Durango, Defendant LONG had a red light.

1 Defendant LONG ran the red light and amshed into Plaintiffs' who had control of the intersection,
2 propelling Plaintiffs' into a light pole. Upon the collision with the light pole, Plaintiff KAUR was
3 ejected from the vehicle. Plaintiffs were all transported to UMC Trauma with serious injuries. The
4 LVMPD Fatality Unit conducted an investigation of the accident.

5 9. Plaintiffs allege that Defendant LONG's negligence in speeding and running a red light,
6 caused her to smash into Plaintiffs' vehicle. Defendant LONG's negligence was the proximate and legal
7 cause of this accident.

8 10. Plaintiffs allege that since Defendant LONG's negligence was committed while she
9 was acting within the course and scope of her employment/agency/missionary work with Defendant
10 PRESIDENT, BISHOP, DOES I through X, and/or ROE CORPORATIONS I through X, and these
11 Defendants are vicariously liable for the negligence of Defendant LONG pursuant to the doctrine of
12 respondeat superior and agency liability.

13 11. Plaintiffs allege that Defendant LONG's negligence was committed while she was
14 acting under the direct supervision of her employer/agent/entity on whose behalf she was on a mission,
15 Defendants PRESIDENT, BISHOP, who failed to properly supervise, monitor, and regulate the behavior
16 of its employee/agent/missionary, LONG. In particular, Defendants PRESIDENT and BISHOP did not
17 properly train and supervise Defendant LONG as to safe driving in Las Vegas. As a direct result of this
18 negligent supervision, Plaintiffs were injured.

19 12. That at all times mentioned herein, Defendant LONG was an employee, agent, and
20 missionary for Defendants PRESIDENT and BISHOP. Defendants PRESIDENT and BISHOP did not
21 provide a reasonable background check on LONG as to her ability to safely drive one of its vehicles.
22 If Defendant LG had conducted a reasonable investigation of Defendant LONG, Defendants would have
23 seen that Defendant LONG was not qualified to safely drive the car in question. In failing to adequately
24 investigate Defendant LONG, Defendants PRESIDENT and BISHOP were negligent in the hiring of
25 Defendant LONG to drive the subject vehicle. As a result of Defendants PRESIDENT and BISHOP's
26 negligent hiring of Defendant LONG to drive their vehicle, Plaintiffs were injured

27 13. Plaintiff alleges that prior to this accident, Defendants PRESIDENT and BISHOP knew of
28 Defendant LONG's unsafe driving record. Nonetheless, Defendants PRESIDENT and BISHOP still

1 directed LONG to operate, as part of her job/missionary duties, the motor vehicle involved in the subject
2 accident. In allowing LONG to drive the vehicle even though they knew that she was an unsafe driver,
3 Defendants PRESIDENT and BISHOP are liable for negligent entrustment of the vehicle to LONG.

4 14. That as a direct and proximate result of the aforesaid negligence of Defendants, Plaintiffs
5 each suffered serious and disabling injuries together with other economic losses in an amount in excess
6 of \$10,000.00.

7 15. That as a further direct and proximate result of the aforesaid negligence of Defendants
8 and each of them, Plaintiffs have been and will in the future be caused to expend sums of money for
9 medical care and expenses, the total amount of which cannot at this time be determined.

10 16. That it has been necessary for Plaintiffs to retain legal counsel and therefore Plaintiffs are
11 entitled to reasonable attorneys fees and costs as damages in this action.

12 WHEREFORE, Plaintiffs pray for a judgment against Defendants as follows:

- 13 1. For general damages in a sum in excess of \$10,000.00;
14 2. For special damages in an amount to be ascertained at trial;
15 3. For reasonable attorneys fees, costs, and prejudgment interest; and,
16 4. For such other and further relief as the Court may deem appropriate.

17 DATED this 9th day of March, 2015.

18 **CRAIG P. KENNY & ASSOCIATES**

19 By:

20 LEON R. SYMANSKI, ESQ.

21 Nevada Bar No. 8686
22 501 S. Eighth Street
23 Las Vegas, Nevada 89101
24 Attorneys for Plaintiffs
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1 **IAFD**
2 **LEON R. SYMANSKI, ESQ.**
3 Bar No. 8686
4 **CRAIG P. KENNY & ASSOCIATES**
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DISTRICT COURT
CLARK COUNTY, NEVADA

9 KRISHAN LAL, KULDIP KAUR,
10 KANCHAN PAUL, and RANJANA PAUL,

11 Plaintiffs,

12 v.

13 MARINA LONG, CORPORATION OF
14 THE PRESIDENT OF THE CHURCH OF
15 JESUS CHRIST OF LATTER-DAY
16 SAINTS, CORPORATION OF THE
17 PRESIDING BISHOP OF THE CHURCH
18 OF JESUS CHRIST OF LATTER DAY
19 SAINTS, et al.

20 Defendants.

CASE NO:

DEPT. NO:

21 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for parties
22 appearing in the above-entitled action as indicated below:

23 Plaintiff NRISHAN LAL	\$270
24 Plaintiff KULDIP KAUR	\$30
25 Plaintiff KANCHAN PAUL	\$30

1 Plaintiff RANJANA PAUL

\$30

2 TOTAL FEES:

\$360

3 DATED this 9th day of March, 2015.

5 CRAIG P. KENNY & ASSOCIATES

6 By:

7 LEON R. SYMANSKI, ESQ.

8 Nevada Bar No. 8686

9 501 S. 8th Street

10 Las Vegas, Nevada 89101

11 Attorneys for Plaintiffs